

**PLAINTIFFS' PROPOSED AGENDA**

**May 15, 2020 Discovery Conference**

<b>Topic Number</b>	<b>TOPIC</b>	<b>PROPOSED DEADLINE</b>
1.	FB to provide ESI disclosures (description of ESI systems, locations of those systems, how ESI is stored and how ESI will be or has been retrieved from these systems)	May 21, 2020
2.	Parties to reach agreement on ESI Locations	May 28, 2020
3.	Facebook to revise, propose search terms and prepare hit reports	June 2, 2020
4.	Plaintiffs to review search terms and provide response	June 9, 2020
5.	Parties to agree on search terms and submit joint letter brief on areas in dispute	June 24, 2020